



February 11, 1993

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U.S. Environmental Protection Agency  
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RE: Revised RCRA Part A Application for Quemetco, Inc., City of Industry, California, EPA  
I.D. # CAD 066 233 966

Gentlemen:

Enclosed please find the referenced application for Quemetco, Inc. This application<sup>1</sup> is submitted in consideration of the recently promulgated standards for containment buildings (40 CFR Part 265 Subpart DD). 40 CFR 265.1100 indicates the subpart DD provisions become effective February 18, 1993. Thus this application is timely submitted.

As discussed in the November 13, 1992, variance request, RSR was the first secondary lead recycler to construct containment buildings at its facilities. RSR participated extensively in EPA's development of the containment building standards. In fact, EPA is producing a video of several of RSR's facilities, including Quemetco, for use as guidance by EPA personnel in evaluating and inspecting containment buildings.

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<sup>1</sup> Quemetco's submission of this application should not be construed by EPA as a waiver of Quemetco's belief that the materials it manages in its building are not solid waste under the Resource Conservation and Recovery Act (RCRA). Neither should EPA construe this submission to mean that Quemetco believes its building requires permitting under RCRA. Nonetheless, Quemetco is submitting this application in the event it concludes the unit requires permitting.

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At the time of this application, Quemetco has essentially completed construction of Phase I of the building project and has begun construction of Phase II. Currently, all EPA intended raw materials are being handled in the Phase I section of the building.

In addition to the current interim status battery storage area and the new building, this application also includes the water treatment system (TO1). This system is included at the request of the State of California and is not required by federal regulations.

I trust that this information is sufficient to achieve interim status for the new building, however, should you have any questions or comments do not hesitate to call me at (214) 631-6070.

Respectfully submitted,



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Environmental Engineer  
Environmental Services  
RSR Corporation

GL/mc

cc: Lynn L. Bergeson  
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